

**SCURA, WIGFIELD, HEYER,
STEVENS & CAMMAROTA, LLP**

1599 Hamburg Turnpike

Wayne, New Jersey 07470

Tel.: 973-696-8391

Guillermo Gonzalez, Esq. (Attorney ID 076102014)

Counsel to the Plaintiffs

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

MARLON J. WILDING,

DEBTOR.

Case No. 17-35624

Chapter 7

SEAN AND LAURIE HALAW,

PLAINTIFFS,

VS.

MARLON J. WILDING

DEFENDANT.

Judge: Hon. Rosemary Gambardella

Adv. Pro. No. 18-01154

Certification of Attorney Fees and Costs

I, Guillermo J. Gonzalez, of full age, being duly sworn according to law upon my oath and having competent knowledge of the facts herein depose and say:

1. I am a Partner at the law firm of Scura Wigfield Heyer Stevens & Cammarota, LLP (“SWHSC”), attorneys for Sean and Laurie Halaw (collectively the “Plaintiff”) in the above captioned matter, and I am fully familiar with the facts recited herein. I submit this Certification

of Attorney Fees and Costs pursuant to opinion of this Court dated June 29, 2023. See Case No. 1801154. Doc No. 73.

2. As stated by the Court, “[t]he Debtor shall be ordered to pay the Appellants-Plaintiffs for reasonable attorney’s fees and costs incurred by their counsel drafting emails and letters to Debtor’s counsel requesting outstanding discovery on and after January 4, 2019, drafting and prosecuting the Motion to Compel, and drafting any subsequent requests for compliance with the Compel Order as well as the preparation and filing of the initial Motion for Sanctions on August 27, 2019.” See Case No. 1801154. Doc No. 73, pg. 40.

3. Pursuant to the Court’s request, counsel for Plaintiff submits the same, in addition to any reply briefs, preparation for oral argument, and attendance for oral argument concerning the Motion for Sanctions (also known as the Motion to Strike). Plaintiff submits that additional briefing and oral argument concerning the same is fair in the interest of justice.

4. Attached hereto as **Exhibit A** is an itemization of the hourly work performed by SWHSC. Counsel for Plaintiff has redacted unrelated portions of the legal bill in accordance with the opinion set forth by the Court.

5. Although numerous partners, associates, paralegals, and law clerks have worked on the matter during the duration of this matter, only the following have provided legal services during this applicable time period.

6. Guillermo J. Gonzalez is a Partner, civil litigation attorney, and bankruptcy attorney at SWHSC who has been licensed in the State of New Jersey and the State of New York. Mr. Gonzalez’s agreed upon billing rate on this case was \$375.00 as an Associate Attorney. At the time of the applicable time entries, Mr. Gonzalez was an associate attorney.

7. David L. Stevens is a Partner and bankruptcy attorney at SWHSC who has been

licensed in the State of New Jersey and the State of New York. Mr. Gonzalez's agreed upon billing rate on this case was \$425.00.

8. David Sklar, Esq., was a former associate bankruptcy attorney at SWHSC who has been licensed in the State of New Jersey and the State of New York. Mr. Sklar's agreed upon billing rate in this case was \$375.00 per hour.

9. Jamal Romero, Esq., is an associate bankruptcy attorney at SWHSC who has been licensed in the State of New Jersey. At the time of the applicable time entries, Mr. Romero was a paralegal at SWHSC with several years of experience and his agreed upon billing rate in this case was \$175.00 per hour.

10. Brendan Greve, Esq. is an associate civil litigation attorney and former law clerk at SWHSC who has been licensed in the State of New Jersey. At the time of the applicable time entries, Mr. Greve was a law clerk at SWHSC and attending Brooklyn Law School. His agreed upon billing rate in this case was \$175.00 per hour.

11. Michael O'Neil is a graduate of Berkley College and U.S. Army Reservist with many years of experience as a litigation paralegal. Mr. O'Neil's paraprofessional billing rate on this case is \$175 per hour.

12. In total, there have been \$49.00 in costs during this applicable time entry period.

13. In total, there was \$16,392.96. in attorney fees during this applicable time entry period.

14. Combining the total costs and attorney fees, counsel for Plaintiff requests \$16,442.96 during this applicable time entry period.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements made

by me are willfully false, I am subject to punishment.

Dated: July 19, 2023

/s/Guillermo J. Gonzalez

Guillermo J. Gonzalez, Esq.